

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

I2Z TECHNOLOGY, LLC,	§	
	§	Civil Action No. 12-cv-5649
Plaintiff,	§	
	§	
v.	§	COMPLAINT FOR
	§	PATENT INFRINGEMENT
ORBITZ WORLDWIDE, INC.,	§	
	§	DEMAND FOR JURY TRIAL
Defendant.	§	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff I2Z Technology, LLC (“I2Z” or “Plaintiff”), by way of its Complaint against Defendant Orbitz Worldwide, Inc. (“Defendant”), demands a jury trial and hereby alleges as follows:

NATURE OF THE ACTION

1. This is an action for patent infringement of United States Patent No. 5,345,551 (the ’551 Patent) arising under the patent laws of the United States, 35 U.S.C § 271 *et seq.*

THE PARTIES

2. Plaintiff I2Z Technology, LLC is a limited liability company organized under the laws of Texas with its principal place of business at 3301 Marshall Avenue, Suite 302, Longview, Texas 75604.

3. Defendant is a corporation organized under the laws of Delaware with its principal place of business at 500 W. Madison Street, Suite 1000, Chicago, Illinois 60661.

JURISDICTION AND VENUE

4. This is an action for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code.

5. This Court has jurisdiction over the subject matter of this action under 28 U.S.C. §§ 1331 and 1338(a).

6. This Court has personal jurisdiction over Defendant at least because Defendant maintains its principal place of business and conducts business within this Judicial District.

7. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391 and 28 U.S.C. § 1400.

BACKGROUND

8. On September 6, 1994, United States Patent No. 5,345,551, entitled “METHOD AND SYSTEMS FOR SYNCHRONIZATION OF SIMULTANEOUS DISPLAYS OF RELATED DATA SOURCES,” was duly and legally issued by the United States Patent and Trademark Office. A true and correct copy of the ’551 Patent is attached as Exhibit A to this Complaint.

9. I2Z is the assignee and owner of the entire right, title, and interest in and to the ’551 Patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

10. Defendant has made and distributes to customers throughout the United States a software application for use on Apple ipads (“the Orbitz app”).

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 5,345,551

11. I2Z realleges and incorporates by reference the previous paragraphs of this complaint as though set forth in full herein.

12. Defendant has infringed and continues to infringe one or more claims of the ’551 Patent in this Judicial District and elsewhere by making and using infringing products, including at least the Orbitz app, which infringes one or more claims of the ’551 Patent. By making and

using such an infringing product, Defendant has directly infringed one or more claims of the '551 Patent under 35 U.S.C. § 271(a).

13. Because of Defendant's infringement of the '551 Patent, I2Z has suffered damages and will continue to suffer damages in the future.

14. Defendant has had notice of the '551 Patent since at least March 7, 2012, when I2Z sent a letter informing Defendant of its infringement of the '551 Patent.

15. Upon information and belief, Defendant's continued infringement despite its knowledge of the '551 Patent has been objectively reckless and willful.

JURY DEMAND

16. Pursuant to Rule 38 of the Federal Rules of Civil Procedure, I2Z demands a trial by jury on all issues triable as such.

PRAYER FOR RELIEF

WHEREFORE, I2Z respectfully demands judgment for itself and against Defendant as follows:

- A. An adjudication that Defendant has infringed the '551 Patent;
- B. An award of damages to be paid by Defendant adequate to compensate I2Z for its past infringement of the '551 Patent and any continuing or future infringement of the '551 Patent through the date such judgment is entered, together with pre-judgment and post-judgment interest;
- C. Increased damages pursuant to 35 U.S.C. § 284 for Defendant's infringement of the '551 Patent after having received notice of such infringement;
- D. An accounting of all infringing acts including, but not limited to, those acts not presented at trial;

E. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Plaintiff's reasonable attorneys' fees, expenses and costs; and

F. Such other and further relief at law or in equity as the Court deems just and proper.

Dated: June 18, 2012

Respectfully Submitted,

/s/ Patrick Burns.

Patrick Burns

Illinois State Bar No. 3122589

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